

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SANTANDER HOLDINGS USA, INC. &  
SUBSIDIARIES,

Plaintiff,

V.

UNITED STATES OF AMERICA,

Defendant.

Case No. 09-cv-11043

Hon. George A. O'Toole, Jr.

April 19, 2012

**PLAINTIFF'S UNOPPOSED MOTION FOR AN  
EXTENSION OF TIME TO FILE ITS OPPOSITION TO DEFENDANT'S  
FED. R. CIV. P. 30(a)(2)(B) MOTION FOR LEAVE TO DEPOSE AN INMATE**

Plaintiff Santander Holdings USA, Inc. (formerly Sovereign Bancorp, Inc. and hereinafter “Plaintiff”), respectfully moves this Court for an extension of time from April 20, 2012, to and including April 27, 2012, to oppose Defendant United States of America’s Fed. R. Civ. P. 30(a)(2)(B) motion for leave to depose an inmate filed on April 6, 2012.

As grounds for this extension, Plaintiff states that a number of depositions have continued in this and other STARS cases in which Plaintiff's counsel is involved that have required significant attention. Further, Plaintiff's lead counsel has been overseas since April 15, 2012 in connection with another matter. As a result, Plaintiff requires additional time to prepare its opposition. This extension will not delay the proceedings because the Parties have already submitted a Stipulation and Proposed Order Regarding the Depositions of Certain Witnesses and Certain Other Discovery Issues (Dkt. No. 104) in which they stipulated, subject to Court approval, that the proposed deposition, if permitted, could occur during May or June.

On April 18, 2012, counsel for Plaintiff spoke with Defendant's counsel who consented to this request.

WHEREFORE, Plaintiff respectfully requests entry of an order allowing Plaintiff until and including April 27, 2012, to file an opposition to Defendant's Fed. R. Civ. P. 30(a)(2)(B) motion for leave to depose an inmate.

Respectfully submitted this 19th day of April, 2012.

COUNSEL FOR PLAINTIFF

/s/ Rajiv Madan

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 19, 2012.

/s/ Rajiv Madan

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